

HONE LAW

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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

HELEN MOJTEHEDI, an individual,

Plaintiff,

v.

CHRISTIAN DURANTE d/b/a and a/k/a
DURANTE INSURANCE and
FINANCIAL SERVICES also d/b/a and
a/k/a DURANTE AGENCY; DOES 1
through 10 and ROE Corporations 11
through 20,

Defendants.

Case No. 2:23-cv-00402-JCM-DJA

**STIPULATION AND ORDER
TO EXTEND BRIEFING SCHEDULE
FOR [ECF 44] PLAINTIFF'S MOTION
TO EXTEND DISCOVERY DEADLINES**

(First Request)

Defendant Christian Durante ("Defendant") and Plaintiff Helen Mojtehededi ("Plaintiff," and jointly with Defendant, the "Parties"), by and through their undersigned counsel, hereby submit this Stipulation and Order to extend the briefing schedule on Plaintiff's Motion to Extend Discovery Deadlines (ECF 44), to allow the Parties to continue their discussion regarding the requested extension.

IT IS HEREBY STIPULATED AND AGREED as follows:

1. Jill Garcia, lead counsel for Defendant, unexpectedly passed away on February 5, 2024.
2. Under the current scheduling order [ECF 39], discovery closed on February 9, 2024.
3. On February 9, 2024, Plaintiff filed a Motion to Extend Discovery Deadlines (ECF 44), requesting a 90-day extension of time to complete the remaining discovery.

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1 4. Pursuant to LR 7-2, Defendant's response to the Motion would be due on
2 February 23, 2024.

3 5. Since before Plaintiff filed the Motion, counsel for the Parties have been
4 discussing the terms of a stipulation to complete discovery.

5 6. At present, the Parties' counsel are close to an agreement that would resolve the
6 Motion but need some additional time to finalize the terms and prepare a written stipulation for
7 the Court's review.

8 7. Therefore, the Parties agree to extend Defendant's deadline to file his response to
9 the Motion by seven (7) days, from February 23, 2024 to March 1, 2024.

10 Respectfully stipulated to and submitted this 23rd day of February 2024, by:

11 HONE LAW

12 /s/ Kelly B. Stout

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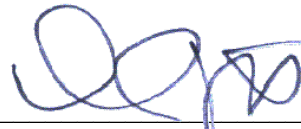
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21 **IT IS SO ORDERED.**

22 

23 DANIEL J. ALBREGTS

24 UNITED STATES MAGISTRATE JUDGE

25 DATED: February 28, 2024

